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To:

Federal Communications Commission

45 L Street NE

Washington, DC 20554

RE: Proceeding # 21-264

To whom it may concern:

- ITEM Ltd. plans to market Wave™ sensors for touchless activation by pedestrians in the United States that will use 60 GHz pulse radar, and therefore has a strong interest in the FCC adopting rules that will allow for these radar operations.
Given the high possibility of transferring viral infections (COVID-19) via surfaces contaminated with the virus requires for elimination of as many devices as possible in public areas that need touching for service.
- ITEM Ltd. supports the proposals for new rules that were made by Acconeer in its comments filed in the proceeding (ET Docket No. 21-264).
- It is important for the FCC to promote advances in new radar technologies by adopting rules that are flexible, consistent with the ETSI standards, and technologically neutral. This will allow manufacturers greater certainty in developing innovative radar technologies in a cost-effective manner.
- Because of ITEM Ltd.'s planned use of pulse radar technology, it is especially important that the Commission ensure that all types of radar systems are treated equally when considering the impact of proposed technical rules on their specific operations. The Commission should not inadvertently provide a competitive advantage to some parties or others by adopting rules that have varying consequences on different radar technologies.

Respectfully Submitted,

ITEM Ltd.

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Director of Engineering

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